

**EXHIBIT A**

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO: 2022-004411-CA-01

STEEL MEDIA GROUP, LLC,  
Plaintiff,

v.

HAROLD LEWIS, an  
individual; and RICHIE  
BROWNE; an individual

Defendants  
\_\_\_\_\_

**SUMMONS**

THE STATE OF FLORIDA:  
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the  
Complaint in this lawsuit on the Defendant as follows:

**HAROLD LEWIS  
5 Lakeview Ct.  
Lake St. Louis, MO 63367**

DATED on this \_\_\_\_\_ day of April, 2022.

CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_ As Deputy Clerk

**IMPORTANT**

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court, you must also mail or take a copy of your written response to the Plaintiffs' attorney named below.

**IMPORTANTE**

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentarse por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, puede perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presente su respuesta ante el tribunal, debe también enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff's Attorney" (Demandante o Abogado del Demandante).

**IMPORTANT**

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce Tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

**RECALDE LAW FIRM, P.A.**  
**Attorneys for Plaintiff**  
**1815 Purdy Avenue**  
**Miami Beach, FL 33139**  
**Tel: (305) 792-9100**



IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO:

STEEL MEDIA GROUP, LLC,  
Plaintiff,

v.

HAROLD LEWIS, an  
individual; and RICHIE  
BROWNE; an individual

Defendants

---

**COMPLAINT**

Plaintiff, STEEL MEDIA GROUP, LLC ("STEEL MEDIA" or "Plaintiff"), by and through their undersigned attorneys, sue Defendants HAROLD LEWIS, an individual ("Lewis"), and RICHIE BROWNE, an individual ("Browne") (collectively, "Defendants") and alleges as follows:

**JURISDICTION AND VENUE**

1. STEEL MEDIA is a Florida limited liability company with principal place of business in Miami, Florida.
2. Defendant LEWIS is an individual, over the age of 18, and is otherwise sui juris.
3. Defendant BROWNE is an individual, over the age of 18, and is otherwise sui juris.
4. Venue is proper in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida because the actions, facts, events and representations that gave rise to this cause of action occurred in Miami, Florida.
5. This is a cause of action for, inter alia, damages caused by Defendants arising out of transactions and representations made in Miami-Dade County, Florida.



6. The Plaintiffs seeks damages in excess of \$30,000, exclusive of costs, legal fees and interests.

7. All conditions precedent to the filing of this action have occurred, are deemed waived, excused, or are otherwise satisfied.

8. The Plaintiffs have retained the Recalde Law Firm, P.A. to represent them in the prosecution of this action and are obligated to pay said law firm a reasonable fee for its services.

#### **NATURE OF THE ACTION**

9. This is an action for fraud, unjust enrichment, conversion, and civil theft, against the Defendants stemming from Defendants' fraudulent misrepresentations made by the Defendants to the Plaintiff in connection with a sale of tickets to the National Football League ("NFL")'s Super Bowl LIV sporting event (the "Super Bowl").

#### **GENERAL ALLEGATIONS**

10. On or about December 17, 2019, non-party Luis Rodriguez, the principal of Steel Media Group, LLC, held a telephone call with Browne and Lewis, during which call Browne and Lewis represented to Rodriguez that they could supply Steel Media with forty (40) Super Bowl tickets, and that those tickets were located in the stadium's lower level endzone.

11. During the December 17, 2019 call, Browne and Lewis further represented to Rodriguez that, if Steel Media were to acquire all forty (40) lower level endzone Super Bowl tickets, at \$4,500 per ticket, Browne and Lewis would be able to procure an additional fifty to one hundred (50 – 100) *additional* lower level Super Bowl tickets.

12. Browne and Lewis represented that they were able to secure these unique and valuable Super Bowl tickets because of Browne's high position within the Anheuser-Busch organization, and contacts within the National Football League ("NFL") organization.

13. Lewis and Browne formed a text-message group with Rodriguez, in which Browne provided Rodriguez with wire instructions in order for Rodriguez to send the funds for the ticket purchase.

14. On or about December 30, 2019, Rodriguez and Maxx Leppselter, on behalf of Steel Media, sent Browne a total of \$50,000 to secure the purchase of the forty (40) lower level endzone tickets.

15. Between January 9, 2020 and January 21, 2020, Rodriguez and Max Leppselter, on behalf of Steel Media, wired to Browne the balance for the forty (40) lower level endzone tickets, to-wit, the remaining sum of \$130,000.00, for a total of \$180,000.00.

16. Between January 19 and 20, 2020, Lewis requested that Steel Media put him up at the Lowe's hotel in Miami Beach, and represented to Rodriguez that he can supply yet additional Super Bowl tickets. Lewis then requested an additional night at the Lowes Hotel. Steel Media provided these accommodations in furtherance of obtaining the tickets, and paid for four nights for two rooms at the Lowe's hotel at a cost of \$13,478.

17. On January 22, 2020, Browne confirmed the wires, and informed that he would be providing the ticket locations by January 24, 2020.

18. On or about January 20, 2020, Plaintiff wired an additional \$27,500, and, subsequently, on January 24, 2020, an additional \$39,000 to Lewis, for an additional ten (10) Super Bowl tickets at different locations in the stadium (for a total of 50 tickets requested by Steel Media and promised by Defendants).

19. As of January 24, 2020, Defendants did not provide any tickets or ticket locations.

20. On January 28, 2020, Browne stopped responding to Plaintiff. Lewis then met with Plaintiff. During this meeting, Lewis represented to Plaintiff that Browne and Lewis were



34. At all relevant times, Browne and Lewis made misrepresentations to Rodriguez, Max Leppselter and Russell Piekarsky, all on behalf of Steel Media, of material facts, including the strength of their "contacts" at the NFL; their ability to procure the most desirable lower level Super Bowl tickets; their ability to procure high volumes of such desirable Super Bowl tickets; and their intent to in fact supply such tickets to Steel Media.

35. Steel Media was forced to inform multiple clients that Steel Media would be unable to fulfill their orders, causing substantial losses in future business opportunities and reputation as a direct and proximate cause of Defendants' actions as described herein above.

36. All conditions precedent have been satisfied or waived.

#### **COUNT I – FRAUD IN THE INDUCEMENT**

37. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

38. The Defendants made various misrepresentations to the Plaintiffs of material facts.

39. The Defendants' misrepresentations were of material facts including the strength of their "contacts" at the NFL; their ability to procure the most desirable lower level Super Bowl tickets; their ability to procure high volumes of such desirable Super Bowl tickets; and their intent to in fact supply such tickets to Steel Media.

40. The Defendants' misrepresentations were made with specific statements made during meetings, phone calls and text messages as described herein above.

41. The Defendants intentionally made such misrepresentations, with the intent to obtain funds from the Plaintiff and convert such funds for Defendants' own use.

42. The Plaintiff reasonably relied on Defendants' misrepresentations, and, based upon such reliance, remitted substantial funds to the Defendants by wire transfer.



43. As a result, Plaintiff suffered damages.

**WHEREFORE**, Plaintiff respectfully requests this honorable Court enter an order awarding damages against the Defendants, and such other remedies as this court may deem just and proper under the circumstances.

**COUNT II – UNJUST ENRICHMENT**

44. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

45. The Plaintiff has conferred a benefit on the Defendants, who have knowledge of such benefit.

46. The Defendants voluntarily accepted the benefit conferred by Plaintiff, and retained such benefits.

47. The circumstances are such that it would be inequitable for the Defendants to retain the benefit without paying the value thereof to the Plaintiff.

**WHEREFORE**, Plaintiff respectfully requests this honorable Court enter an order awarding damages against the Defendants, and such other remedies as this court may deem just and proper under the circumstances.

**COUNT III– CIVIL THEFT**

48. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

49. Defendants obtained and/or used \$129,500 of Plaintiff's money without ever intending to supply Plaintiff with the highly valuable Super Bowl tickets.

50. Defendant unlawfully and knowingly used or endeavor to use Plaintiff's money and intentionally deprived or endeavor to deprive Plaintiff of its money with the intent to temporarily

or permanently deprive Plaintiff of its right to the money and benefit thereof, all for Defendant's own use, or the use of any person not entitled thereto, in violation of Fla. Stat. § 812.014.

51. As a direct and proximate cause of Defendant's unlawful actions, Plaintiff was and continues to be deprived of its right to its property and the benefit therefrom, and has suffered damages in the minimum amount of \$129,500, exclusive of consequential damages.

52. Fla. Stat. § 772.11, authorizes the recovery of threefold the actual damages sustained as well as attorney's fees and costs at the trial and appellate levels.

53. Defendant has been provided with notice and demand for payment in according with Fla. Stat. § 772.11. *See* Ex. A.

**WHEREFORE**, Plaintiff seeks treble damages, court costs and all reasonable attorney's fees, and any further relief the Court deems just and proper.

Dated: March 8, 2022

Respectfully submitted,

**RECALDE LAW FIRM, P.A.**

*Attorneys for Plaintiff*

1815 Purdy Avenue

Miami Beach, FL 33139

Ph: 305-792-9100

By: /s/ Rafael Recalde

Rafael Recalde, Esq.

FBN: 60040

Primary Email: rafael#@recaldelaw.com

Secondary Email: geremy@recaldelaw.com

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,  
Plaintiff,

CASE NO: 2022-004411-CA-01

v.

HAROLD LEWIS, an  
individual; and RICHIE  
BROWNE; an individual

Defendants  
\_\_\_\_\_ /

**SUMMONS**

THE STATE OF FLORIDA:  
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the  
Complaint in this lawsuit on the Defendant as follows:

**RICHIE BROWNE**  
**701 The Hamptons Lane**  
**Chesterfield, MO 63017**

DATED on this \_\_\_\_\_ day of April, 2022.

CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_ As Deputy Clerk

**IMPORTANT**

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).



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**IMPORTANTE**

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**Attorneys for Plaintiff**  
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HAROLD LEWIS, an  
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BROWNE; an individual

Defendants  
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**COMPLAINT**

Plaintiff, STEEL MEDIA GROUP, LLC ("STEEL MEDIA" or "Plaintiff"), by and through their undersigned attorneys, sue Defendants HAROLD LEWIS, an individual ("Lewis"), and RICHIE BROWNE, an individual ("Browne") (collectively, "Defendants") and alleges as follows:

**JURISDICTION AND VENUE**

1. STEEL MEDIA is a Florida limited liability company with principal place of business in Miami, Florida.
2. Defendant LEWIS is an individual, over the age of 18, and is otherwise sui juris.
3. Defendant BROWNE is an individual, over the age of 18, and is otherwise sui juris.
4. Venue is proper in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida because the actions, facts, events and representations that gave rise to this cause of action occurred in Miami, Florida.
5. This is a cause of action for, inter alia, damages caused by Defendants arising out of transactions and representations made in Miami-Dade County, Florida.



6. The Plaintiffs seeks damages in excess of \$30,000, exclusive of costs, legal fees and interests.

7. All conditions precedent to the filing of this action have occurred, are deemed waived, excused, or are otherwise satisfied.

8. The Plaintiffs have retained the Recalde Law Firm, P.A. to represent them in the prosecution of this action and are obligated to pay said law firm a reasonable fee for its services.

#### **NATURE OF THE ACTION**

9. This is an action for fraud, unjust enrichment, conversion, and civil theft, against the Defendants stemming from Defendants' fraudulent misrepresentations made by the Defendants to the Plaintiff in connection with a sale of tickets to the National Football League ("NFL")'s Super Bowl LIV sporting event (the "Super Bowl").

#### **GENERAL ALLEGATIONS**

10. On or about December 17, 2019, non-party Luis Rodriguez, the principal of Steel Media Group, LLC, held a telephone call with Browne and Lewis, during which call Browne and Lewis represented to Rodriguez that they could supply Steel Media with forty (40) Super Bowl tickets, and that those tickets were located in the stadium's lower level endzone.

11. During the December 17, 2019 call, Browne and Lewis further represented to Rodriguez that, if Steel Media were to acquire all forty (40) lower level endzone Super Bowl tickets, at \$4,500 per ticket, Browne and Lewis would be able to procure an additional fifty to one hundred (50 – 100) *additional* lower level Super Bowl tickets.

12. Browne and Lewis represented that they were able to secure these unique and valuable Super Bowl tickets because of Browne's high position within the Anheuser-Busch organization, and contacts within the National Football League ("NFL") organization.



13. Lewis and Browne formed a text-message group with Rodriguez, in which Browne provided Rodriguez with wire instructions in order for Rodriguez to send the funds for the ticket purchase.

14. On or about December 30, 2019, Rodriguez and Maxx Leppselter, on behalf of Steel Media, sent Browne a total of \$50,000 to secure the purchase of the forty (40) lower level endzone tickets.

15. Between January 9, 2020 and January 21, 2020, Rodriguez and Max Leppselter, on behalf of Steel Media, wired to Browne the balance for the forty (40) lower level endzone tickets, to-wit, the remaining sum of \$130,000.00, for a total of \$180,000.00.

16. Between January 19 and 20, 2020, Lewis requested that Steel Media put him up at the Lowe's hotel in Miami Beach, and represented to Rodriguez that he can supply yet additional Super Bowl tickets. Lewis then requested an additional night at the Lowes Hotel. Steel Media provided these accommodations in furtherance of obtaining the tickets, and paid for four nights for two rooms at the Lowe's hotel at a cost of \$13,478.

17. On January 22, 2020, Browne confirmed the wires, and informed that he would be providing the ticket locations by January 24, 2020.

18. On or about January 20, 2020, Plaintiff wired an additional \$27,500, and, subsequently, on January 24, 2020, an additional \$39,000 to Lewis, for an additional ten (10) Super Bowl tickets at different locations in the stadium (for a total of 50 tickets requested by Steel Media and promised by Defendants).

19. As of January 24, 2020, Defendants did not provide any tickets or ticket locations.

20. On January 28, 2020, Browne stopped responding to Plaintiff. Lewis then met with Plaintiff. During this meeting, Lewis represented to Plaintiff that Browne and Lewis were

exchanging text messages regarding the procurement of the tickets through their “contacts” at the NFL.

21. As of January 28, 2020, Defendants provided only 6 out of the 10 additional Super Bowl tickets, but none of the 40 lower level endzone tickets originally promised.

22. Because Defendants failed to provide any of the lower level endzone tickets as promised, on January 29, 2020, Steel Media was forced to make arrangements to fulfill orders previously promised to their customers. In particular, Steel Media was forced to purchase box seating (“living room box”) directly from the Miami Dolphins, at a cost of \$120,000.00, in order to fulfill orders previously promised to Steel Media’s customers on reliance upon Lewis and Browne’s representations.

23. Additionally, on January 30, 2020, Steel Media was forced to purchase a “Cabana Suite” from the Miami Dolphins, at a cost of \$180,000.00, in order to fulfill additional commitments that Steel Media made to customers in reliance upon Browne and Lewis’s representations.

24. Additionally, Steel Media was sued by a client and was forced to reimburse the customer \$40,000.00 based upon the inability to fulfill such customer’s order caused by Browne and Lewis’s failure to procure and provide tickets to Steel Media as promised.

25. At this point, Steel Media incurred losses from the purchase of replacement seating arrangements, as well as from the funds wired to Browne and Lewis.

26. On January 31, 2020, Browne provided Plaintiff with 8 lower level endzone tickets out of the initial 40 tickets requested, and 4 tickets located in another area of the stadium.

27. On or about February 1, 2020, Browne contacted non-party Luis Rodriguez, the principal of Steel Media Group, LLC, via the video-call software “Facetime”, to inform Rodriguez



that Browne had at least one hundred (100) Super Bowl tickets in his possession, and, during that call, showed to Mr. Rodriguez tickets purporting to be the Super Bowl tickets that Mr. Browne would make available for Steel Media.

28. Later that evening, around 7 pm on February 1, 2020, Browne provided another 6 lower level endzone seats, and 2 seats in another area of the stadium.

29. Around 9 pm on February 1, 2020, Browne provided an additional 16 tickets, 12 of which were lower level endzone tickets and 4 were located in other areas of the stadium.

30. Later that same evening, Lewis provided 2 additional tickets, which were not lower level endzone tickets.

31. Thus, as of February 1, 2020, being the day before the Super Bowl, Steel Media received 38 tickets in total, 26 of which were lower level endzone tickets as originally promised by Defendants, 14 of which were located in other areas of the stadium. However, because the tickets were provided at the last minute, Plaintiff already had to make other arrangements to accommodate their customers at great additional expense, as explained more fully above.

32. The following morning, on February 2, 2020 (the day of the Super Bowl), Steel Media was forced to pay an additional \$27,000 to a ticket broker named Jake Lindmark in order to fulfill a ticket order to another customer of Steel Media. At this time, Plaintiff discovered that Defendants did not have an NFL contact at all, but rather, were purchasing tickets from Mr. Lindmark.

33. That same morning, on February 2, 2020, Steel Media had to pay an additional \$70,000 in order to obtain 6 tickets to fulfill the remaining ticket orders needed for Steel Media's customers.



34. At all relevant times, Browne and Lewis made misrepresentations to Rodriguez, Max Leppselter and Russell Piekarsky, all on behalf of Steel Media, of material facts, including the strength of their “contacts” at the NFL; their ability to procure the most desirable lower level Super Bowl tickets; their ability to procure high volumes of such desirable Super Bowl tickets; and their intent to in fact supply such tickets to Steel Media.

35. Steel Media was forced to inform multiple clients that Steel Media would be unable to fulfill their orders, causing substantial losses in future business opportunities and reputation as a direct and proximate cause of Defendants’ actions as described herein above.

36. All conditions precedent have been satisfied or waived.

#### **COUNT I – FRAUD IN THE INDUCEMENT**

37. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

38. The Defendants made various misrepresentations to the Plaintiffs of material facts.

39. The Defendants’ misrepresentations were of material facts including the strength of their “contacts” at the NFL; their ability to procure the most desirable lower level Super Bowl tickets; their ability to procure high volumes of such desirable Super Bowl tickets; and their intent to in fact supply such tickets to Steel Media.

40. The Defendants’ misrepresentations were made with specific statements made during meetings, phone calls and text messages as described herein above.

41. The Defendants intentionally made such misrepresentations, with the intent to obtain funds from the Plaintiff and convert such funds for Defendants’ own use.

42. The Plaintiff reasonably relied on Defendants’ misrepresentations, and, based upon such reliance, remitted substantial funds to the Defendants by wire transfer.

43. As a result, Plaintiff suffered damages.

**WHEREFORE**, Plaintiff respectfully requests this honorable Court enter an order awarding damages against the Defendants, and such other remedies as this court may deem just and proper under the circumstances.

**COUNT II – UNJUST ENRICHMENT**

44. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

45. The Plaintiff has conferred a benefit on the Defendants, who have knowledge of such benefit.

46. The Defendants voluntarily accepted the benefit conferred by Plaintiff, and retained such benefits.

47. The circumstances are such that it would be inequitable for the Defendants to retain the benefit without paying the value thereof to the Plaintiff.

**WHEREFORE**, Plaintiff respectfully requests this honorable Court enter an order awarding damages against the Defendants, and such other remedies as this court may deem just and proper under the circumstances.

**COUNT III– CIVIL THEFT**

48. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

49. Defendants obtained and/or used \$129,500 of Plaintiff's money without ever intending to supply Plaintiff with the highly valuable Super Bowl tickets.

50. Defendant unlawfully and knowingly used or endeavor to use Plaintiff's money and intentionally deprived or endeavor to deprive Plaintiff of its money with the intent to temporarily

or permanently deprive Plaintiff of its right to the money and benefit thereof, all for Defendant's own use, or the use of any person not entitled thereto, in violation of Fla. Stat. § 812.014.

51. As a direct and proximate cause of Defendant's unlawful actions, Plaintiff was and continues to be deprived of its right to its property and the benefit therefrom, and has suffered damages in the minimum amount of \$129,500, exclusive of consequential damages.

52. Fla. Stat. § 772.11, authorizes the recovery of threefold the actual damages sustained as well as attorney's fees and costs at the trial and appellate levels.

53. Defendant has been provided with notice and demand for payment in according with Fla. Stat. § 772.11. *See* Ex. A.

**WHEREFORE**, Plaintiff seeks treble damages, court costs and all reasonable attorney's fees, and any further relief the Court deems just and proper.

Dated: March 8, 2022

Respectfully submitted,

**RECALDE LAW FIRM, P.A.**

*Attorneys for Plaintiff*

1815 Purdy Avenue

Miami Beach, FL 33139

Ph: 305-792-9100

By: /s/ Rafael Recalde

Rafael Recalde, Esq.

FBN: 60040

Primary Email: rafael#@recaldelaw.com

Secondary Email: jeremy@recaldelaw.com



**EXHIBIT C**

**FORM 1.997. CIVIL COVER SHEET**

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

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**I. CASE STYLE**

IN THE CIRCUIT/COUNTY COURT OF THE ELEVENTH JUDICIAL CIRCUIT,  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Steel Media Group, LLC  
Plaintiff

Case # \_\_\_\_\_  
Judge \_\_\_\_\_

vs.

Harold Lewis, Richie Browne  
Defendant

---

**II. AMOUNT OF CLAIM**

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less  
☐ \$8,001 - \$30,000  
☐ \$30,001- \$50,000  
☒ \$50,001- \$75,000  
☐ \$75,001 - \$100,000  
☒ over \$100,000.00

**III. TYPE OF CASE** (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

## **CIRCUIT CIVIL**

- ☐ Condominium
- ☒ Contracts and indebtedness
- ☐ Eminent domain
- ☐ Auto negligence
- ☐ Negligence—other
  - ☐ Business governance
  - ☐ Business torts
  - ☐ Environmental/Toxic tort
  - ☐ Third party indemnification
  - ☐ Construction defect
  - ☐ Mass tort
  - ☐ Negligent security
  - ☐ Nursing home negligence
  - ☐ Premises liability—commercial
  - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
  - ☐ Commercial foreclosure
  - ☐ Homestead residential foreclosure
  - ☐ Non-homestead residential foreclosure
  - ☐ Other real property actions
- ☐ Professional malpractice
  - ☐ Malpractice—business
  - ☐ Malpractice—medical
  - ☐ Malpractice—other professional
- ☐ Other
  - ☐ Antitrust/Trade regulation
  - ☐ Business transactions
  - ☐ Constitutional challenge—statute or ordinance
  - ☐ Constitutional challenge—proposed amendment
  - ☐ Corporate trusts
  - ☐ Discrimination—employment or other
  - ☐ Insurance claims
  - ☐ Intellectual property
  - ☐ Libel/Slander
  - ☐ Shareholder derivative action
  - ☐ Securities litigation
  - ☐ Trade secrets
  - ☐ Trust litigation

## **COUNTY CIVIL**

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure



- ☐ Replevins
- ☐ Evictions
  - ☐ Residential Evictions
  - ☐ Non-residential Evictions
- ☐ Other civil (non-monetary)

**COMPLEX BUSINESS COURT**

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

**IV. REMEDIES SOUGHT** (check all that apply):

- ☒ Monetary;
- ☐ Nonmonetary declaratory or injunctive relief;
- ☐ Punitive

**V. NUMBER OF CAUSES OF ACTION:** [    ]  
(Specify)

3

**VI. IS THIS CASE A CLASS ACTION LAWSUIT?**

- ☐ yes
- ☒ no

**VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?**

- ☒ no
- ☐ yes If "yes," list all related cases by name, case number, and court.

**VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?**

- ☐ yes
- ☒ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Rafael Recalde  
Attorney or party

Fla. Bar # 60040  
(Bar # if attorney)

Rafael Recalde  
(type or print name)

03/08/2022  
Date

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO:

STEEL MEDIA GROUP, LLC,  
Plaintiff,

v.

HAROLD LEWIS, an  
individual; and RICHIE  
BROWNE; an individual

Defendants  
\_\_\_\_\_ /

**COMPLAINT**

Plaintiff, STEEL MEDIA GROUP, LLC (“STEEL MEDIA” or “Plaintiff”), by and through their undersigned attorneys, sue Defendants HAROLD LEWIS, an individual (“Lewis”), and RICHIE BROWNE, an individual (“Browne”) (collectively, “Defendants”) and alleges as follows:

**JURISDICTION AND VENUE**

1. STEEL MEDIA is a Florida limited liability company with principal place of business in Miami, Florida.
2. Defendant LEWIS is an individual, over the age of 18, and is otherwise sui juris.
3. Defendant BROWNE is an individual, over the age of 18, and is otherwise sui juris.
4. Venue is proper in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida because the actions, facts, events and representations that gave rise to this cause of action occurred in Miami, Florida.
5. This is a cause of action for, inter alia, damages caused by Defendants arising out of transactions and representations made in Miami-Dade County, Florida.

6. The Plaintiffs seeks damages in excess of \$30,000, exclusive of costs, legal fees and interests.

7. All conditions precedent to the filing of this action have occurred, are deemed waived, excused, or are otherwise satisfied.

8. The Plaintiffs have retained the Recalde Law Firm, P.A. to represent them in the prosecution of this action and are obligated to pay said law firm a reasonable fee for its services.

#### **NATURE OF THE ACTION**

9. This is an action for fraud, unjust enrichment, conversion, and civil theft, against the Defendants stemming from Defendants' fraudulent misrepresentations made by the Defendants to the Plaintiff in connection with a sale of tickets to the National Football League ("NFL")'s Super Bowl LIV sporting event (the "Super Bowl").

#### **GENERAL ALLEGATIONS**

10. On or about December 17, 2019, non-party Luis Rodriguez, the principal of Steel Media Group, LLC, held a telephone call with Browne and Lewis, during which call Browne and Lewis represented to Rodriguez that they could supply Steel Media with forty (40) Super Bowl tickets, and that those tickets were located in the stadium's lower level endzone.

11. During the December 17, 2019 call, Browne and Lewis further represented to Rodriguez that, if Steel Media were to acquire all forty (40) lower level endzone Super Bowl tickets, at \$4,500 per ticket, Browne and Lewis would be able to procure an additional fifty to one hundred (50 – 100) *additional* lower level Super Bowl tickets.

12. Browne and Lewis represented that they were able to secure these unique and valuable Super Bowl tickets because of Browne's high position within the Anheuser-Busch organization, and contacts within the National Football League ("NFL") organization.



13. Lewis and Browne formed a text-message group with Rodriguez, in which Browne provided Rodriguez with wire instructions in order for Rodriguez to send the funds for the ticket purchase.

14. On or about December 30, 2019, Rodriguez and Maxx Leppselter, on behalf of Steel Media, sent Browne a total of \$50,000 to secure the purchase of the forty (40) lower level endzone tickets.

15. Between January 9, 2020 and January 21, 2020, Rodriguez and Max Leppselter, on behalf of Steel Media, wired to Browne the balance for the forty (40) lower level endzone tickets, to-wit, the remaining sum of \$130,000.00, for a total of \$180,000.00.

16. Between January 19 and 20, 2020, Lewis requested that Steel Media put him up at the Lowe's hotel in Miami Beach, and represented to Rodriguez that he can supply yet additional Super Bowl tickets. Lewis then requested an additional night at the Lowes Hotel. Steel Media provided these accommodations in furtherance of obtaining the tickets, and paid for four nights for two rooms at the Lowe's hotel at a cost of \$13,478.

17. On January 22, 2020, Browne confirmed the wires, and informed that he would be providing the ticket locations by January 24, 2020.

18. On or about January 20, 2020, Plaintiff wired an additional \$27,500, and, subsequently, on January 24, 2020, an additional \$39,000 to Lewis, for an additional ten (10) Super Bowl tickets at different locations in the stadium (for a total of 50 tickets requested by Steel Media and promised by Defendants).

19. As of January 24, 2020, Defendants did not provide any tickets or ticket locations.

20. On January 28, 2020, Browne stopped responding to Plaintiff. Lewis then met with Plaintiff. During this meeting, Lewis represented to Plaintiff that Browne and Lewis were

exchanging text messages regarding the procurement of the tickets through their “contacts” at the NFL.

21. As of January 28, 2020, Defendants provided only 6 out of the 10 additional Super Bowl tickets, but none of the 40 lower level endzone tickets originally promised.

22. Because Defendants failed to provide any of the lower level endzone tickets as promised, on January 29, 2020, Steel Media was forced to make arrangements to fulfill orders previously promised to their customers. In particular, Steel Media was forced to purchase box seating (“living room box”) directly from the Miami Dolphins, at a cost of \$120,000.00, in order to fulfill orders previously promised to Steel Media’s customers on reliance upon Lewis and Browne’s representations.

23. Additionally, on January 30, 2020, Steel Media was forced to purchase a “Cabana Suite” from the Miami Dolphins, at a cost of \$180,000.00, in order to fulfill additional commitments that Steel Media made to customers in reliance upon Browne and Lewis’s representations.

24. Additionally, Steel Media was sued by a client and was forced to reimburse the customer \$40,000.00 based upon the inability to fulfill such customer’s order caused by Browne and Lewis’s failure to procure and provide tickets to Steel Media as promised.

25. At this point, Steel Media incurred losses from the purchase of replacement seating arrangements, as well as from the funds wired to Browne and Lewis.

26. On January 31, 2020, Browne provided Plaintiff with 8 lower level endzone tickets out of the initial 40 tickets requested, and 4 tickets located in another area of the stadium.

27. On or about February 1, 2020, Browne contacted non-party Luis Rodriguez, the principal of Steel Media Group, LLC, via the video-call software “Facetime”, to inform Rodriguez

that Browne had at least one hundred (100) Super Bowl tickets in his possession, and, during that call, showed to Mr. Rodriguez tickets purporting to be the Super Bowl tickets that Mr. Browne would make available for Steel Media.

28. Later that evening, around 7 pm on February 1, 2020, Browne provided another 6 lower level endzone seats, and 2 seats in another area of the stadium.

29. Around 9 pm on February 1, 2020, Browne provided an additional 16 tickets, 12 of which were lower level endzone tickets and 4 were located in other areas of the stadium.

30. Later that same evening, Lewis provided 2 additional tickets, which were not lower level endzone tickets.

31. Thus, as of February 1, 2020, being the day before the Super Bowl, Steel Media received 38 tickets in total, 26 of which were lower level endzone tickets as originally promised by Defendants, 14 of which were located in other areas of the stadium. However, because the tickets were provided at the last minute, Plaintiff already had to make other arrangements to accommodate their customers at great additional expense, as explained more fully above.

32. The following morning, on February 2, 2020 (the day of the Super Bowl), Steel Media was forced to pay an additional \$27,000 to a ticket broker named Jake Lindmark in order to fulfill a ticket order to another customer of Steel Media. At this time, Plaintiff discovered that Defendants did not have an NFL contact at all, but rather, were purchasing tickets from Mr. Lindmark.

33. That same morning, on February 2, 2020, Steel Media had to pay an additional \$70,000 in order to obtain 6 tickets to fulfill the remaining ticket orders needed for Steel Media's customers.



34. At all relevant times, Browne and Lewis made misrepresentations to Rodriguez, Max Leppselter and Russell Piekarsky, all on behalf of Steel Media, of material facts, including the strength of their “contacts” at the NFL; their ability to procure the most desirable lower level Super Bowl tickets; their ability to procure high volumes of such desirable Super Bowl tickets; and their intent to in fact supply such tickets to Steel Media.

35. Steel Media was forced to inform multiple clients that Steel Media would be unable to fulfill their orders, causing substantial losses in future business opportunities and reputation as a direct and proximate cause of Defendants’ actions as described herein above.

36. All conditions precedent have been satisfied or waived.

**COUNT I – FRAUD IN THE INDUCEMENT**

37. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

38. The Defendants made various misrepresentations to the Plaintiffs of material facts.

39. The Defendants’ misrepresentations were of material facts including the strength of their “contacts” at the NFL; their ability to procure the most desirable lower level Super Bowl tickets; their ability to procure high volumes of such desirable Super Bowl tickets; and their intent to in fact supply such tickets to Steel Media.

40. The Defendants’ misrepresentations were made with specific statements made during meetings, phone calls and text messages as described herein above.

41. The Defendants intentionally made such misrepresentations, with the intent to obtain funds from the Plaintiff and convert such funds for Defendants’ own use.

42. The Plaintiff reasonably relied on Defendants’ misrepresentations, and, based upon such reliance, remitted substantial funds to the Defendants by wire transfer.

43. As a result, Plaintiff suffered damages.

**WHEREFORE**, Plaintiff respectfully requests this honorable Court enter an order awarding damages against the Defendants, and such other remedies as this court may deem just and proper under the circumstances.

**COUNT II – UNJUST ENRICHMENT**

44. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

45. The Plaintiff has conferred a benefit on the Defendants, who have knowledge of such benefit.

46. The Defendants voluntarily accepted the benefit conferred by Plaintiff, and retained such benefits.

47. The circumstances are such that it would be inequitable for the Defendants to retain the benefit without paying the value thereof to the Plaintiff.

**WHEREFORE**, Plaintiff respectfully requests this honorable Court enter an order awarding damages against the Defendants, and such other remedies as this court may deem just and proper under the circumstances.

**COUNT III– CIVIL THEFT**

48. The Plaintiffs reallege and reaver the allegations contained in Paragraphs 1 through 36 as if fully set forth herein.

49. Defendants obtained and/or used \$129,500 of Plaintiff's money without ever intending to supply Plaintiff with the highly valuable Super Bowl tickets.

50. Defendant unlawfully and knowingly used or endeavor to use Plaintiff's money and intentionally deprived or endeavor to deprive Plaintiff of its money with the intent to temporarily

or permanently deprive Plaintiff of its right to the money and benefit thereof, all for Defendant's own use, or the use of any person not entitled thereto, in violation of Fla. Stat. § 812.014.

51. As a direct and proximate cause of Defendant's unlawful actions, Plaintiff was and continues to be deprived of its right to its property and the benefit therefrom, and has suffered damages in the minimum amount of \$129,500, exclusive of consequential damages.

52. Fla. Stat. § 772.11, authorizes the recovery of threefold the actual damages sustained as well as attorney's fees and costs at the trial and appellate levels.

53. Defendant has been provided with notice and demand for payment in according with Fla. Stat. § 772.11. *See* Ex. A.

**WHEREFORE**, Plaintiff seeks treble damages, court costs and all reasonable attorney's fees, and any further relief the Court deems just and proper.

Dated: March 8, 2022

Respectfully submitted,

**RECALDE LAW FIRM, P.A.**

*Attorneys for Plaintiff*

1815 Purdy Avenue

Miami Beach, FL 33139

Ph: 305-792-9100

By: /s/ Rafael Recalde

Rafael Recalde, Esq.

FBN: 60040

Primary Email: rafael#@recaldelaw.com

Secondary Email: geremy@recaldelaw.com



IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO: 2022-004411-CA-01

STEEL MEDIA GROUP, LLC,  
Plaintiff,

v.

HAROLD LEWIS, an  
individual; and RICHIE  
BROWNE; an individual

Defendants  
\_\_\_\_\_ /

**SUMMONS**

THE STATE OF FLORIDA:  
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the  
Complaint in this lawsuit on the Defendant as follows:

**HAROLD LEWIS  
5 Lakeview Ct.  
Lake St. Louis, MO 63367**

DATED on this \_\_\_\_\_ day of April, 2022.

CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_ As Deputy Clerk

**IMPORTANT**

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court, you must also mail or take a copy of your written response to the Plaintiffs' attorney named below.

**IMPORTANTE**

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentarse por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debe usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff's Attorney" (Demandante o Abogado del Demandante).

**IMPORTANT**

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce Tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

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**RECALDE LAW FIRM, P.A.**  
**Attorneys for Plaintiff**  
**1815 Purdy Avenue**  
**Miami Beach, FL 33139**  
**Tel: (305) 792-9100**

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO: 2022-004411-CA-01

STEEL MEDIA GROUP, LLC,  
Plaintiff,

v.

HAROLD LEWIS, an  
individual; and RICHIE  
BROWNE; an individual

Defendants  
\_\_\_\_\_ /

**SUMMONS**

THE STATE OF FLORIDA:  
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the  
Complaint in this lawsuit on the Defendant as follows:

**RICHIE BROWNE  
701 The Hamptons Lane  
Chesterfield, MO 63017**

DATED on this \_\_\_\_\_ day of April, 2022.

CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_ As Deputy Clerk

**IMPORTANT**

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**Attorneys for Plaintiff**  
**1815 Purdy Avenue**  
**Miami Beach, FL 33139**  
**Tel: (305) 792-9100**

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO: 2022-004411-CA-01

STEEL MEDIA GROUP, LLC,  
Plaintiff,

v.

HAROLD LEWIS, an  
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BROWNE; an individual

Defendants  
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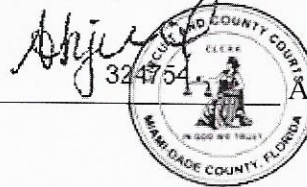
**HAROLD LEWIS**  
**5 Lakeview Ct.**  
**Lake St. Louis, MO 63367**

4/14/2022

DATED on this \_\_\_\_\_ day of April, 2022.

CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_



As Deputy Clerk

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**Attorneys for Plaintiff**  
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IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO: 2022-004411-CA-01

STEEL MEDIA GROUP, LLC,  
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HAROLD LEWIS, an  
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BROWNE; an individual

Defendants  
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**SUMMONS**

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To Each Sheriff of the State:

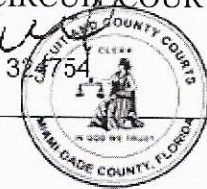
YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the  
Complaint in this lawsuit on the Defendant as follows:

**RICHIE BROWNE**  
**701 The Hamptons Lane**  
**Chesterfield, MO 63017**

4/14/2022  
DATED on this \_\_\_\_\_ day of April, 2022.

CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_ As Deputy Clerk



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Si desea responder a la demanda por su cuenta, al mismo tiempo en que presente su respuesta ante el tribunal, debe usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff's Attorney" (Demandante o Abogado del Demandante).

**IMPORTANT**

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce Tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

**RECALDE LAW FIRM, P.A.**  
**Attorneys for Plaintiff**  
**1815 Purdy Avenue**  
**Miami Beach, FL 33139**  
**Tel: (305) 792-9100**

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,

Plaintiff,

vs.

Case No. 2022-004411-CA-01

HAROLD LEWIS and RICHIE  
BROWNE,

Defendants.

---

**NOTICE OF APPEARANCE & DESIGNATION OF  
E-MAIL ADDRESSES PURSUANT TO FLA. R. JUD. ADMIN. 2.516**

PLEASE TAKE NOTICE that the undersigned counsel, James Tarquin, P.A., hereby appears of counsel of record for Defendant, Harold Lewis, and, therefore, requests all interested parties serve upon the undersigned true and correct copies of all pleadings, notices, and other filings served upon any party to this civil action.

Furthermore, Defendant, Harold Lewis, hereby gives notice of his compliance with Florida Rule of Judicial Administration 2.516, and request that all service on Defendant, Harold Lewis, from this date forward, be provided in accordance with Rule 2.516.

Counsel for Defendant, Harold Lewis, hereby designates the following email addresses for purpose of service of all documents required to be served thereunder:

Primary E-Mail: [tarquinlawoffice@aol.com](mailto:tarquinlawoffice@aol.com)

Secondary E-Mail: [JamesTarquinLawOffice@gmail.com](mailto:JamesTarquinLawOffice@gmail.com)



Dated: May 25, 2022

Respectfully submitted,

/ s / James Tarquin  
James P. Tarquin  
Florida Bar No. 906190  
JAMES P. TARQUIN, P.A.  
333 NW 3rd Avenue  
Ocala, Florida 34475  
Telephone: (352) 401-7671  
tarquinlawoffice@aol.com  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 25, 2022, I electronically filed the foregoing with the Florida Courts E-Filing Portal which will deliver a copy to Rafael Recalde, Recalde Law Firm, P.A., 1815 Purdy Avenue, Miami Beach, Florida 33139 at Rafael#@recaldelaw.com.

/ s / James Tarquin  
James Tarquin

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,

Plaintiff,

vs.

Case No. 2022-004411-CA-01

HAROLD LEWIS and RICHIE  
BROWNE,

Defendants.

---

**DEFENDANT HAROLD LEWIS' MOTION FOR ENLARGEMENT  
OF TIME TO SERVE RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant, Harold Lewis (hereinafter "Defendant"), by and through his undersigned counsel, hereby submits Defendant Harold Lewis' Motion For Enlargement Of Time To Serve Response To Plaintiffs' Complaint. In support of his motion, Defendant states as follows:

1. On or about May 12, 2022, Plaintiff, Steel Media Group, LLC (hereinafter "Plaintiff") served Defendant with a summons and a copy of the Complaint.
2. Pursuant to Florida Rule of Civil Procedure 1.140(a), Defendant is required to file a responsive pleading to the Complaint on or before June 1, 2022. *See* FLA. R. CIV. P. 1.140(a) ("A defendant shall serve an answer within 20 days after service of original process and the initial pleading on the defendant[.]").
3. Defendant has recently retained the undersigned attorney to defend his interests in this lawsuit. Presently, the undersigned attorney is in the process of receiving and reviewing information and material from Defendant needed to assist him in preparing an appropriate response to the Complaint. In order to provide the time necessary for inquiry and to prepare appropriate response to the Complaint, Defendant requests a twenty (20) day enlargement of time, up to and including June 21, 2022, to serve a response to the Complaint.

4. Florida Rule of Civil Procedure 1.090(b) provides, in pertinent part, that:

When an act is required or allowed to be done at or within a specified time by order of court, by these rules, or by notice given thereunder, for cause shown the court at any time in its discretion (1) with or without notice, may order the period enlarged if request is made before expiration of the period originally prescribed or as extended by previous order.

FLA. R. CIV. P. 1.090(b). Defendant has filed his request for an enlargement of time within the time required for serving a response to the Complaint.

5. If the Court grants the requested enlargement of time, Defendant's response to the Complaint must be served on or before June 21, 2022.

6. For the foregoing reasons, it would be an appropriate exercise of the Court's discretion to grant the requested enlargement.

WHEREFORE, Defendant respectfully requests that the Court grant an enlargement of time through June 21, 2022, for Defendant to serve his response to the Complaint.



Dated: May 25, 2022

Respectfully submitted,

/ s / James Tarquin  
James P. Tarquin  
Florida Bar No. 906190  
JAMES P. TARQUIN, P.A.  
333 NW 3rd Avenue  
Ocala, Florida 34475  
Telephone: (352) 401-7671  
tarquinlawoffice@aol.com  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 25, 2022, I electronically filed the foregoing with the Florida Courts E-Filing Portal which will deliver a copy to Rafael Recalde, Recalde Law Firm, P.A., 1815 Purdy Avenue, Miami Beach, Florida 33139 at Rafael#@recaldelaw.com.

/ s / James Tarquin  
James Tarquin

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,

Plaintiff,

vs.

Case No. 2022-004411-CA-01

HAROLD LEWIS, an individual,  
and RICHIE BROWNE, an individual,

Defendants.

---

**ORDER GRANTING DEFENDANT HAROLD  
LEWIS' MOTION FOR ENLARGEMENT OF TIME TO  
TO SERVE RESPONSE TO PLAINTIFF'S COMPLAINT**

Before the Court is Defendant Harold Lewis' Motion For Enlargement Of Time To Serve Response To Plaintiff's Complaint, which was filed with the Court on May 25, 2022.

ORDERED: Defendant Harold Lewis' Motion For Enlargement Of Time To Serve Response To Plaintiff's Complaint is granted. Defendant Harold Lewis shall have until June 21, 2022 to serve a response to Plaintiff's Complaint.

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,

Plaintiff,

vs.

Case No. 2022-004411-CA-01

HAROLD LEWIS and RICHIE  
BROWNE,

Defendants.

---

**DEFENDANT RICHIE BROWNE'S MOTION FOR ENLARGEMENT  
OF TIME TO SERVE RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant, Richie Browne (hereinafter "Defendant"), by and through his undersigned counsel, hereby submits Defendant Richie Browne's Motion For Enlargement Of Time To Serve Response To Plaintiff's Complaint. In support of his motion, Defendant states as follows:

1. On or about May 17, 2022, Plaintiff, Steel Media Group, LLC (hereinafter "Plaintiff") served Defendant with a summons and a copy of the Complaint.

2. Pursuant to Florida Rule of Civil Procedure 1.140(a), Defendant is required to file a responsive pleading to the Complaint on or before June 6, 2022. *See* FLA. R. CIV. P. 1.140(a) ("A defendant shall serve an answer within 20 days after service of original process and the initial pleading on the defendant[.]").

3. Defendant has recently retained the undersigned attorney to defend his interests in this lawsuit. Presently, the undersigned attorney is in the process of receiving and reviewing information and material from Defendant needed to assist him in preparing an appropriate response to the Complaint. In order to provide the time necessary for inquiry and to prepare appropriate response to the Complaint, Defendant requests a fifteen (15) day enlargement of time, up to and including June 21, 2022, to serve a response to the Complaint.



4. Florida Rule of Civil Procedure 1.090(b) provides, in pertinent part, that:

When an act is required or allowed to be done at or within a specified time by order of court, by these rules, or by notice given thereunder, for cause shown the court at any time in its discretion (1) with or without notice, may order the period enlarged if request is made before expiration of the period originally prescribed or as extended by previous order.

FLA. R. CIV. P. 1.090(b). Defendant has filed his request for an enlargement of time within the time required for serving a response to the Complaint.

5. If the Court grants the requested enlargement of time, Defendant's response to the Complaint must be served on or before June 21, 2022.

6. For the foregoing reasons, it would be an appropriate exercise of the Court's discretion to grant the requested enlargement.

WHEREFORE, Defendant respectfully requests that the Court grant an enlargement of time through June 21, 2022, for Defendant to serve his response to the Complaint.

Dated: June 5, 2022

Respectfully submitted,

/ s / James Tarquin  
James P. Tarquin  
Florida Bar No. 906190  
JAMES P. TARQUIN, P.A.  
333 NW 3rd Avenue  
Ocala, Florida 34475  
Telephone: (352) 401-7671  
tarquinlawoffice@aol.com  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 5, 2022, I electronically filed the foregoing with the Florida Courts E-Filing Portal which will deliver a copy to Rafael Recalde, Recalde Law Firm, P.A., 1815 Purdy Avenue, Miami Beach, Florida 33139 at rafael@recaldelaw.com.

/ s / James Tarquin  
James Tarquin

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,

Plaintiff,

vs.

Case No. 2022-004411-CA-01

HAROLD LEWIS and RICHIE  
BROWNE,

Defendants.

---

**NOTICE OF APPEARANCE & DESIGNATION OF  
E-MAIL ADDRESSES PURSUANT TO FLA. R. JUD. ADMIN. 2.516**

PLEASE TAKE NOTICE that the undersigned counsel, James Tarquin, P.A., hereby appears of counsel of record for Defendant, Richie Browne, and, therefore, requests all interested parties serve upon the undersigned true and correct copies of all pleadings, notices, and other filings served upon any party to this civil action.

Furthermore, Defendant, Richie Browne, hereby gives notice of his compliance with Florida Rule of Judicial Administration 2.516, and request that all service on Defendant, Richie Browne, from this date forward, be provided in accordance with Rule 2.516.

Counsel for Defendant, Richie Browne, hereby designates the following email addresses for purpose of service of all documents required to be served thereunder:

Primary E-Mail: [tarquinlawoffice@aol.com](mailto:tarquinlawoffice@aol.com)

Secondary E-Mail: [JamesTarquinLawOffice@gmail.com](mailto:JamesTarquinLawOffice@gmail.com)



Dated: June 5, 2022

Respectfully submitted,

/ s / James Tarquin  
James P. Tarquin  
Florida Bar No. 906190  
JAMES P. TARQUIN, P.A.  
333 NW 3rd Avenue  
Ocala, Florida 34475  
Telephone: (352) 401-7671  
tarquinlawoffice@aol.com  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 5, 2022, I electronically filed the foregoing with the Florida Courts E-Filing Portal which will deliver a copy to Rafael Recalde, Recalde Law Firm, P.A., 1815 Purdy Avenue, Miami Beach, Florida 33139 at rafael@recaldelaw.com.

/ s / James Tarquin  
James Tarquin

**EXHIBIT D**

DOCUMENT# L20000230278

**Entity Name:** STEEL MEDIA GROUP, LLC

**Current Principal Place of Business:**

1221 BRICKELL AVENUE  
SUITE 900  
MIAMI, FL 33131

**FILED**  
**Mar 05, 2022**  
**Secretary of State**  
**2123415514CC**

**Current Mailing Address:**

1221 BRICKELL AVENUE  
SUITE 900  
MIAMI, FL 33131 US

**FEI Number:** 47-5172307

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

MYCOMPANYWORKS, INC.  
625 E. TWIGGS ST.  
SUITE 1000  
TAMPA, FL 33602 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** ED T

03/05/2022

Electronic Signature of Registered Agent

Date

**Authorized Person(s) Detail :**

Title AMBR  
Name RODRIGUEZ, LUIS  
Address 717 LIBERTY AVE., APT 2301  
City-State-Zip: PITTSBURGH PA 15222

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** LUIS RODRIGUEZ

MEMBER

03/05/2022

Electronic Signature of Signing Authorized Person(s) Detail

Date



DOCUMENT# L20000230278

**Entity Name:** STEEL MEDIA GROUP, LLC

**Current Principal Place of Business:**

1221 BRICKELL AVENUE  
SUITE 900  
MIAMI, FL 33131

**FILED**  
**Oct 12, 2021**  
**Secretary of State**  
**1708128012CR**

**Current Mailing Address:**

1221 BRICKELL AVENUE  
SUITE 900  
MIAMI, FL 33131 US

**FEI Number:** 47-5172307

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

MYCOMPANYWORKS, INC.  
625 E. TWIGGS ST.  
SUITE 1000  
TAMPA, FL 33602 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** ED T

10/12/2021

Electronic Signature of Registered Agent

Date

**Authorized Person(s) Detail :**

Title AMBR  
Name RODRIGUEZ, LUIS  
Address 717 LIBERTY AVE., APT 2301  
City-State-Zip: PITTSBURGH PA 15222

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** LUIS RODRIGUEZ

MANAGER

10/12/2021

Electronic Signature of Signing Authorized Person(s) Detail

Date

L20000230278

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

☐ PICK-UP ☐ WAIT ☐ MAIL

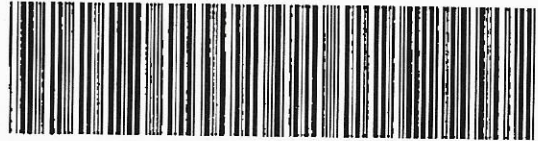
(Business Entity Name)

(Document Number)

Certified Copies \_\_\_\_\_ Certificates of Status \_\_\_\_\_

Special Instructions to Filing Officer:

Office Use Only



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07/27/20--01043--025 \*\*150.00

2020 JUL 23 AM 10:56  
SECRETARY OF STATE  
TALLAHASSEE, FL

FILED

N. CULLIGAN

AUG 10 2023

**COVER LETTER**

**TO:** New Filing Section  
Division of Corporations

**SUBJECT:** Steel Media Group, LLC

(Name of Resulting Florida Limited Company)

The enclosed Articles of Conversion, Articles of Organization, and fees are submitted to convert an "Other Business Entity" into a "Florida Limited Liability Company" in accordance with s. 605.1045, F.S.

Please return all correspondence concerning this matter to:

Ed Tsuji

(Contact Person)

MyCompanyWorks, Inc.

(Firm/Company)

187 E. Warm Springs Road, Suite B

(Address)

Las Vegas, NV 89119

(City, State and Zip Code)

orders@mycompanyworks.com

E-mail Address: (to be used for future annual report notifications)

For further information concerning this matter, please call:

Ed Tsuji

at ( 702 ) 362-2677

(Name of Contact Person)

(Area Code) (Daytime Telephone Number)

Enclosed is a check for the following amount: (All checks processed by this office must be payable in US dollars and drawn on a bank located in the United States)

☒ \$150.00 Filing Fees  
(\$25 for Conversion  
& \$125 for Articles  
of Organization)

☐ \$155.00 Filing Fees  
and Certificate of  
Status

☐ \$180.00 Filing Fees  
and Certified Copy

☐ \$185.00 Filing Fees.  
Certified Copy, and  
Certificate of Status

**Mailing Address:**

New Filing Section  
Division of Corporations  
P.O. Box 6327  
Tallahassee, FL 32314

**Street Address:**

New Filing Section  
Division of Corporations  
The Centre of Tallahassee  
2415 N. Monroe Street, Suite 810  
Tallahassee, FL 32303



FILED

2020 JUL 23 AM 10: 56

SECRETARY OF STATE  
TALLAHASSEE, FL

Articles of Conversion  
For  
"Other Business Entity"  
Into  
Florida Limited Liability Company

The Articles of Conversion **and attached Articles of Organization** are submitted to convert the following **"Other Business Entity"** into a **Florida Limited Liability Company** in accordance with s.605.1045, Florida Statutes.

1. The name of the "Other Business Entity" immediately prior to the filing of the Articles of Conversion is:  
Steel Media Group, LLC

(Enter Name of Other Business Entity)

2. The "Other Business Entity" is a Limited Liability Company  
(Enter entity type. Example: corporation, limited partnership, general partnership, common law or business trust, etc.)

First organized, formed or incorporated under the laws of Delaware  
(Enter state, or if a non-U.S. entity, the name of the country)

on 09/22/2015  
(date of organization, formation or incorporation)

3. The name of the Florida Limited Liability Company as set forth in the **attached Articles of Organization**:  
Steel Media Group, LLC

(Enter Name of Florida Limited Liability Company)

4. If not effective on the date of filing, enter the effective date: \_\_\_\_\_  
(The effective date: Cannot be prior to date of receipt or filed date nor more than 90 calendar days after the date this document is filed by the Florida Department of State.)

**Note:** If the date inserted in this block does not meet the applicable statutory filing requirements, this date will not be listed as the document's effective date on the Department of State's records.

5. The plan of conversion has been approved in accordance with all applicable statutes.

6. The "Converted or Other Business Entity" has agreed to pay any members having appraisal rights the amount to which such members are entitled under ss. 605.1006 and 605.1061-605.1072, F.S.

Signed this 16th day of July 2020.

**Signature of Authorized Representative of Limited Liability Company:**

Signature of Authorized Representative: \_\_\_\_\_

Printed Name: Luis Rodriguez

Title: Member

**Signature(s) on behalf of Other Business Entity: [See below for required signature(s)]**

Signature: \_\_\_\_\_

Printed Name: Luis Rodriguez

Title: Member

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

**If Florida Corporation:**

Signature of Chairman, Vice Chairman, Director, or Officer.

If Directors or Officers have not been selected, an Incorporator must sign.

**If Florida General Partnership or Limited Liability Partnership:**

Signature of one General Partner.

**If Florida Limited Partnership or Limited Liability Limited Partnership:**

Signatures of ALL General Partners.

**All others:**

Signature of an authorized person.

**Fees:**

|  |                    |
|--|--------------------|
| Articles of Conversion:                    | \$25.00            |
| Fees for Florida Articles of Organization: | \$125.00           |
| Certified Copy:                            | \$30.00 (Optional) |
| Certificate of Status:                     | \$5.00 (Optional)  |

## ARTICLES OF ORGANIZATION FOR FLORIDA LIMITED LIABILITY COMPANY

### ARTICLE I - Name:

The name of the Limited Liability Company is:

Steel Media Group, LLC

(Must contain the words "Limited Liability Company," "L.L.C.," or "LLC.")

### ARTICLE II - Address:

The mailing address and street address of the principal office of the Limited Liability Company is:

#### Principal Office Address:

199 E. Flagler St. #246  
Miami, FL 33131

#### Mailing Address:

199 E. Flagler St. #246  
Miami, FL 33131

### ARTICLE III - Registered Agent, Registered Office, & Registered Agent's Signature:

(The Limited Liability Company cannot serve as its own Registered Agent. You must designate an individual or another business entity with an active Florida registration.)

The name and the Florida street address of the registered agent are:

InCorp Services, Inc.

Name

17888 67th Court North

Florida street address (P.O. Box **NOT** acceptable)

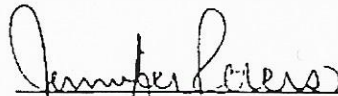
Loxahatchee

FL 33470

City

Zip

*Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 605, F.S..*

  
\_\_\_\_\_  
Registered Agent's Signature (REQUIRED)

Jennifer Peters, Assistant Secretary

(CONTINUED)

2020 JUL 23 AM 10:56  
SECRETARY OF STATE  
TALLAHASSEE, FL

FILED



**ARTICLE IV-**

The name and address of each person authorized to manage and control the Limited Liability Company:

**Title:**

"AMBR" = Authorized Member

"MGR" = Manager

AMBR

**Name and Address:**

Luis Rodriguez

717 Liberty Ave., Apt. 2301

Pittsburgh PA 15222

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

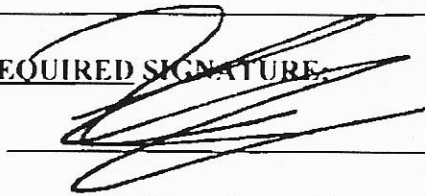
\_\_\_\_\_

(Use attachment if necessary)

**ARTICLE V:** Other provisions, if any.

\_\_\_\_\_  
\_\_\_\_\_

**REQUIRED SIGNATURE:**



**Signature of a member or an authorized representative of a member**

This document is executed in accordance with section 605.0203 (1) (b), Florida Statutes. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

Luis Rodriguez, Member

Typed or printed name of signee

**Filing Fees**

**\$125.00 Filing Fee for Articles of Organization and Designation of Registered Agent**

**\$ 30.00 Certified Copy (Optional)**

**\$ 5.00 Certificate of Status (Optional)**

SECRETARY OF STATE  
TALLAHASSEE, FL

2020 JUL 23 AM 10:56

FILED

**EXHIBIT E**

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STEEL MEDIA GROUP, LLC,

Plaintiff,

vs.

Case No. 2022-004411-CA-01

HAROLD LEWIS, an individual,  
and RICHIE BROWNE, an individual,

Defendants.

---

**DEFENDANTS' NOTICE TO STATE COURT  
OF REMOVAL TO FEDERAL COURT**

PLEASE TAKE NOTICE THAT, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant, Harold Lewis, and Defendant, Richie Browne, (collectively "Defendants"), filed removal papers with the Clerk of the United States District Court for the Southern District of Florida, Miami Division, regarding the above-styled action, Case No. 2022-004411-CA-01. A copy of the Notice of Removal to Federal Court is attached as Exhibit A. The Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, is respectfully requested to proceed no further in this action unless and until such time as the action may be remanded by order of the United States District Court for the Southern District of Florida.



Dated: June 9, 2022

Respectfully submitted,

/ s / James Tarquin  
James P. Tarquin  
Florida Bar No. 906190  
JAMES P. TARQUIN, P.A.  
333 NW 3rd Avenue  
Ocala, Florida 34470  
Telephone: (352) 401-7671  
tarquinlawoffice@aol.com  
Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 9, 2022, I electronically filed the foregoing with the Florida Courts E-Filing Portal which will deliver a copy to Rafael Recalde, Recalde Law Firm, P.A., 1815 Purdy Avenue, Miami Beach, Florida 33139 at rafael@recaldelaw.com.

/ s / James Tarquin  
James Tarquin